

## **Axiom Invest OOD complaints management policy**

( amended by decision of the Managers dated 30.06.2022 ) " Axiom Invest " OOD ( the Company ) was established in the Republic of Bulgaria ( UIC 206621222.) and is licensed by the Financial Supervision Commission ( license No. 562- II /05.08.2021 d .).

This Complaints Management Policy establishes the rules for managing complaints and introduces effective and open procedures for managing complaints and procedures for timely consideration of complaints from clients ( non-professional clients , professional clients or eligible counterparties ) or potential clients of the investment firm. an intermediary .

( amended by decision of the Managers dated 30.06.2022 ) The policy in its current version is available and freely accessible on the website of " Axiom Invest " OOD ( II ): [www.axiominvest.eu](http://www.axiominvest.eu), as well as in the office of the investment an intermediary .

The submission of a complaint , its examination , the measures taken to resolve it and the subsequent response to the client shall be carried out in accordance with the procedure provided for in this policy .

Information relating to the complaint handling process , including information on the complaints management policy and contact details for the complaints management unit , is provided to customers and potential customers upon request or upon receipt of a complaint .

### **Filing complaints**

1. The filing of complaints in connection with disputes between the parties that arose in connection with the provision of investment and additional services within the meaning of the MFIA shall be carried out in accordance with the procedure provided for in this Policy .

2. The filing of complaints in connection with the disputes between the parties arising from the application of Regulation ( EU ) No. 648/2012 of the European Parliament and of the Council of July 4 , 2012 regarding OTC derivatives , central counterparties and transaction registers (EMIR), their proceedings and the receipt of the corresponding answers is carried out in the manner provided for in this regulation .

In the sense of this Policy , a complaint is any written statement of dissatisfaction addressed to an II by a client ( non-professional client , professional client or acceptable counterparty ) or potential client of the investment intermediary , in connection with the intermediary's provision of investment and / or additional services in the sense of the MFIA .

Clients and potential clients of private individuals submit complaints to the investment intermediary completely free of charge .

On the basis of Art . 26, paragraph 3 of Delegated Regulation 2017/565, the II establishes that the unit responsible for considering complaints in the II , submitted by customers or potential customers of the company , is the " Internal Control " Department, which is also the unit for regulatory compliance in the company .

### **Acceptance of complaints**

Any client or potential client who is dissatisfied with the services provided by the Company has the right to submit a complaint to the latter .

Complainants can submit written complaints in free text to the Company in one of the following ways :

a ) ( amended by decision of the Managers dated 30.06.2022 ) in writing at the office of " Axiom Invest " OOD , located at the address : Sofia 1407, 17 Henrik Ibsen Str., floor 11;

b ) ( amended by decision of the Managers dated 30.06.2022 ) in writing on paper by post , addressed to : 1407 gr . Sofia , str . Henrik Ibsen " 17, floor 11;

c ) ( amended by decision of the Managers dated 30.06.2022 ) by e-mail to e-mail: [compliance@axiominvest.eu](mailto:compliance@axiominvest.eu) . eu

Regardless of the way of submitting the complaint , the complainant should include in it at least the following : name and surname , customer number / if any /, detailed description of the circumstances with which he is

dissatisfied , resp . number of the disputed item . Additionally , the complainant must indicate how and where he wishes to receive the answer to his complaint .

In his complaint , the complainant sets out in detail the circumstances that provoked him to file a complaint and are the reason for the lack of satisfaction with the services of the II . When the complainants submit their complaints in writing on the spot in an II office , they have the opportunity to have a conversation with the investment intermediary's employees and discuss the problem .

**( amended by decision of the Managers dated 30.06.2022) When the** complainants submit their complaints in writing on paper by post , they should send their letters to the office of " Axiom Invest " OOD and address them to the attention of the " Internal " department control " of the investment intermediary .

If the complainant has not addressed his letter explicitly to the attention of the " Internal Control " department of the investment intermediary and it enters with the general incoming correspondence , the employee responsible for registering the correspondence passes the complaint to an employee from the " Internal Control " department for entry in the register of complaints and subsequent proceedings .

**( amended by decision of the Managers dated 30.06.2022) When the** complainants submit their complaints by e-mail , they should send it to the e-mail address of the " Internal Control " department of the II at e-mail: [compliance@axiominvest.eu](mailto:compliance@axiominvest.eu)

**( amended by decision of the Managers dated 30.06.2022) If the** complainant did not address his letter explicitly to the e-mail address of the " Internal Control " department of the investment intermediary , but sent it to the official e-mail address of the II or to an e-mail the addresses of any of the employees or departments of the investment intermediary , the relevant official who received the letter forwards it for entry in the register of complaints and subsequent proceedings .

### **Registration of complaints**

[compliance@axiominvest.eu](mailto:compliance@axiominvest.eu) for

Complaints filed are filed in the order of receipt in the complaints register .

If, in the course of communication with the complainant, the II sends a response to the complaint , but he responds with a subsequent complaint or comment to the response, and the communication continues in this cycle one or more times , the II considers and responds to repeated complaints in the order in which it considers and responds to the complaint itself , but repeated complaints are not filed in the complaint register as separate complaints , but since they are logically and procedurally related to the original complaint , they are entered under its unique number .

The complaint register is kept by an employee of the " Internal Control " department of the II .

The new circumstances in the complaints register are entered in such a way that the information contained in the previous entries are not affected , and the deletion of an entered circumstance and the correction of mistakes are carried out in a way that does not lead to the destruction or damage of the information .

The correctness of entries in the register of complaints is checked by the head of the " Internal control " department.

In the register of complaints are entered :

- a ) the date of receipt and the unique number of the complaint in the II ;
- b ) the unique number of the applicant ;
- c ) the corresponding number of the primary documents stored in the II archive , as well as other additional information ;
- d ) the name and signature of the person who made the entry under letters " a " , " b " and " c " ;
- e ) the date of consideration of the complaint by the II ;

**f )** the measures taken in relation to the complaint ( outgoing number of the response to the complaint from the II's office );

**g )** the name of the person who made the entry under letters " e " and " e " .

Procedure for consideration of complaints by the " Internal Control " Department: When considering and responding to complaints, the II :

**a )** follows specific procedures established by the Policy ;

**b )** endeavor to collect and investigate all relevant evidence and information on the case ;

**c )** communicate with the applicant ( client or potential client ) clearly , in plain language that is easily understood ;

**d )** provide an answer without unreasonable delay within the terms of this Policy ;

**e )** provides an opportunity for subsequent protection of the complainant's interests if the response to his complaint does not satisfy him .

The head of the Internal Control Department assigns an employee from the Department and / or himself familiarizes himself with the submitted complaint and performs the necessary studies or inspections in a timely manner .

The head of the Internal Control Department or an employee designated by him conducts a meeting or telephone conversation with the complainant to clarify the case . At the discretion of the Head of the Internal Control Department , the employee of the II against whom the complaint was filed was also present at the meeting .

At this stage of the review of the complaint, a check on its merits is carried out , by checking the facts objectively and comprehensively and, if necessary, taking written explanations from employees of the II , relevant persons and persons working under contract , as well as having the right to request additional information and clarifications by the applicant . If possible :

- take action to eliminate the discrepancy or technical error ;
- proposes the imposition of labor sanctions under the CT or according to the applicable law in the relationship .

When the complaint is partially or fully justified , the Head of the Internal Control Department makes every effort to satisfy the customer's claims and prevent potential legal or arbitration disputes , as well as supervises the preparation of a response to the complaint and supervises its sending to the complainant .

If necessary , at each stage of the investigation and review of the complaint , one of the managers of the II can take part .

The " Internal Control " Department prepares a final written response / opinion to the complainant , which is sent within 10 ( ten ) working days from the date of receipt of the complaint , and when the manager of the II was involved in the review of the complaint

- within 3 ( three ) working days from the end of his work .

In the event that the appeal is characterized by factual and legal complexity , the term may be extended , but up to no more than 20 ( twenty ) working days . If, during the review of the complaint, correspondence is conducted with the client and additional information / documents are requested from him or he himself submits such information without being asked , the deadline for ruling on the complaint may be extended accordingly . The general deadline for a response / statement is determined on a complaint by complaint basis , and the deadlines are not cumulative .

As a result of the complaint and clarification of all facts and circumstances , the Company takes specific actions in relation to the client , which can be expressed by full recognition of the merits of the complaint , partial recognition or complete rejection of the complaint as groundless and unfounded .

Depending on the above, the customer may be offered full compensation for the losses / lost profits suffered by him , partial satisfaction of his claims or complete refusal to satisfy his claim .

**( amended by decision of the Managers dated 30.06.2022) Filing a complaint** is not the only way to protect the client . If the applicant is not satisfied with the response of

" Axiom Invest " OOD to his appeal , he has the right to continue the protection of his interests by means of :

a ) the competent authorities - the Commission for Financial Supervision of the Republic of Bulgaria and the competent court in the Republic of Bulgaria ;

b ) The sectoral conciliation commission for consideration of disputes in the field of activities and services under Art . 6, para . 2 and 3 of the Law on the Markets of Financial Instruments and the Activities and Services under Art . 86, para . 1 and 2 of the Law on the activity of collective investment schemes and other enterprises for collective investment , including the provision of financial services from a distance , in these sectors ( authority for alternative resolution of consumer disputes ), with address : c . Sofia 1000,sq . " Slaveykov " No. 4 A ; tel . +35929330590; website [h p://www.kzp.bg](http://www.kzp.bg); e-mail: [adr.finmarkets@kzp.bg](mailto:adr.finmarkets@kzp.bg) .

If the complainant resides and is established in the European Union , for out-of-court settlement of the dispute , he can also use the services of the Electronic Platform for Online Dispute Resolution of the European Commission , available at the following link : [h ps://webgate.ec.europa .eu/odr/main/index.cfm?event=main.adr.show](https://webgate.ec.europa.eu/odr/main/index.cfm?event=main.adr.show).

**( amended by decision of the Managers dated 30.06.2022) If the complainant** decides to use the services of the Electronic Platform for Online Dispute Resolution of the European Commission , " Axiom Invest " OOD. informs him that it accepts as the sole body for resolving disputes , which will consider a dispute between the parties , the Bulgarian Sectoral Conciliation Commission for considering disputes in the field of activities and services under Art . 6, para . 2 and 3 of the Law on the Markets of Financial Instruments and the Activities and Services under Art . 86, para. 1 and 2 of the Law on the activity of collective investment schemes and other enterprises for collective investment , including the provision of financial services at a distance , in these sectors .

**( amended by decision of the Managers dated 30.06.2022 ) The " Internal Control " Department** of " Axiom Invest " OOD analyzes on a continuous basis the information from the examination of complaints , with the aim of ensuring that recurring or systemic problems are identified and overcome issues as well as potential legal and operational risks . The analysis covers :

**a )** analyzing the causes of individual complaints in order to establish the root causes that are common to different types of complaints ;

**b )** assessment of whether these root causes may also affect other processes or products , including those for which no direct complaints have been made , and

**c )** correcting those root causes where appropriate .

1.1. The investment intermediary shall publish details of the process applied when dealing with a complaint . These details include information about the complaints management policy and contact details for the Internal Controls department. The information is provided to customers and potential customers upon request or upon acceptance of a complaint .

Filing a complaint by clients and / or potential clients of the investment intermediary is free of charge .

The head of the " Internal Control " department has the right to make proposals to the Managers of the II if , as a result of the analysis, it is found necessary to change the internal acts of the investment intermediary or the current contracts , and also has the right to take other actions that are compatible with internal control functions and / or derive from them .

The II stores all documentation and information regarding customer complaints , measures taken to resolve them and internal investigations on magnetic ( electronic ) and / or paper media .

## **Providing information**

The " Internal Control " Department prepares and submits to the FSC by the 15th of the month from which a new quarter begins , a notification regarding the number and summary content of :

1. the written complaints of II customers received during the past quarter , if any , as well as the results of the examination of the received complaints ;

2. lawsuits related to his subject of activity as an II , filed during the past quarter by him and against him , respectively against his managers and against the persons working under a contract for him , as well as for the decisions rendered on the pending cases , if any .

**( amended by decision of the Managers dated 30.06.2022 )** " Axiom Invest " OOD. provides publicly clear , accurate and up-to-date information about the process of handling complaints , which includes details about the way of submitting complaints and about the process that will be follows in the consideration of complaints , and also about the options available for subsequent protection of the interests of customers , including that they can refer the complaint to an alternative dispute resolution structure ( a body for alternative resolution of consumer disputes ). "Axiom Invest OOD. provides the information through its contractual documents and, in order to ensure greater publicity of the complaint handling process, publishes it on its website . This Complaints Management Policy is an independent document that is adopted and developed on the basis and in accordance with the provisions of Art . 26 of Delegated Regulation ( EU ) 2017/565 of the Commission of April 25 , 2016 to supplement Directive 2014/65/ EU of the European Parliament and of the Council regarding the organizational requirements and conditions for carrying out activities by investment intermediaries and for the granting of definitions for the purposes of the said directive ( Delegated Regulation 2017/565), in connection with Art . 68 and Art . 69, para . 1of the Financial Instruments Markets Act ( MFIA ) and comply with the requirements of Directive 2014/65/ EU of the European Parliament and of the Council of May 15 , 2014 regarding financial instruments markets and amending Directive 2002/92/ EC and of Directive 2011/61/ EU (MiFID II) and in particular with Art . 16, paragraph 2.

**( amended by decision of the Managers dated 30.06.2022 )** The complaint management policy was adopted by a decision of the Managers of " Axiom Invest " OOD dated 19.11.2020 . and was amended by a decision dated 30.06.2022 .

#### **Managers :**

- 1. Georgi Kovachev**
- 2. Ventsislav Filipov**

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